



Comments on MSDEC concept for “Afforestation and Restoration Ecology in the Maltese islands” (RCO 30) 3 October 2016

1. Introduction

Reference is being made to the “Outline Strategy for the Implementation of a National Reforestation and Afforestation Project in the Maltese Island” (hereafter referred to as Outline Strategy) drafted under the authority of the Ministry for Sustainable Development, the Environment and Climate change and currently open for public consultations.

BirdLife Malta has reviewed the Outline Strategy and would like to highlight several sections of the document that we consider important and further we provide aspects evaluated as being relevant which have not been considered thus far.

As a second part of this document, it is our aim to raise concerns on potential challenges and constraints for an effective implementation of afforestation and reforestation initiatives and activities in certain parts of Malta. Those have to be taken into consideration and properly addressed in the process of developing frameworks and implementation initiatives for national afforestation and ecological restoration project.

BirdLife Malta

- **agrees that sites with stable native vegetational communities should not be afforested.** This notwithstanding, habitat degradation is a major issue in Malta, and it is therefore recommended that both restoration and afforestation should be considered valid options for severely compromised sites,.
- **looks positively at the afforestation of abandoned agricultural land,** as initiatives would directly target both land abandonment, which is a widespread issue throughout Europe, and habitat loss. The afforestation of abandoned agricultural land would additionally align Malta with the rewilding movement, which has been quickly growing in Europe, and open up opportunities for research, funding, and partnership-building.
- **would like to promote mixed planting systems** that would promote both productive activities and biodiversity in rural areas as highlighted in the Rural Strategy Topic Paper. These include, but are not limited to, agroforestry, fringe planting, and high-nature value agriculture. These systems could potentially be supported by a payment for ecosystem services (PES) scheme that would promote afforestation and nature-friendly agricultural practices.
- **looks extremely positively at afforestation initiatives on Comino,** in accord to existing policies and plans such as the Gozo and Comino Local Plan (Policy GZ-COMI-3) and the Comino Natura 2000 Management Plan. Given the specific conditions of Comino (e.g. low number of residents, the presence of degraded habitats and abandoned agricultural land, and the fact that hunting and trapping are forbidden), the island has exceptional potential to become a fundamental stepping stone for migrating birds, as well as providing habitat for breeding birds. Because of

these conditions, BLM believes that afforestation initiatives on Comino would have a disproportionate effect compared to similar initiatives on Malta or Gozo, and would strongly recommend them.

- **greatly welcomes the Outline Strategy's comments on connecting habitats and creating corridors** throughout the island given the level of habitat fragmentation that characterises Malta.
- **acknowledges the Outline Strategy's comments on an overabundance of plans being drafted**, very few of which are under implementation. BLM strongly urges that the paper-park approach that has so far largely characterised Maltese conservation is abandoned, and that fewer plans are developed and effectively implemented on the ground.

Furthermore, BirdLife Malta would like to raise several concerns of the Outline Strategy which require closer research and analysis due to their potential of hindering a successful implementation of the Outline Strategy's objectives, including:

- **Hunting groves:** Several comments are made throughout the plan in regards to small-scale afforestation initiatives carried out by the hunting community. These initiatives are often used by the hunting community itself to highlight its supposed engagement in conservation issues and the effort in habitat restoration. BirdLife Malta would like to highlight the fact that these initiatives have often made use of non-native, invasive species (*e.g. Eucalyptus spp.*) that have compromised the ecosystem, and that they are not endorsed or condoned by us. *It is recommended that hunting groves of Eucalyptus spp. and others are in fact disregarded in the context of afforestation, and that specific initiatives to convert alien-dominated groves to native ones are implemented.*
- **Urban forestry projects in the past:** Given the high level of urbanisation in the country, BirdLife Malta believes that Malta would greatly benefit from urban afforestation initiatives, which would attract more wildlife to urban areas, improve the microclimate, and promote well-being. We would however like to highlight the disappointing results of urban forestry in the past few years, which often employed extremely aggressive pruning that severely damaged the value of urban habitats. *Our recommendation to address this issue is that nature-friendly practices are employed and awareness of this problem is raised among the relevant stakeholders by providing solid information material over negative impacts that these practises cause.*
- **Public access to forest areas:** as a precautionary measure, it is important to raise the concern of open access to the public for afforested and restored areas. These areas should serve the general public for recreational activities including nature walks, picnics and enjoyment of the natural environment. As an example to afforestation in the Northern region, BirdLife Malta would like to highlight issues concerning the Mizieb woodland, which, although no documentation has so far been produced, is currently claimed by the hunting community which restricts access to it through intimidation. *Given the lack of woodland in Malta, as well as the fact that illegal hunting is still widespread and restricted access most definitely reduces the opportunity to monitor the area, BirdLife Malta believes that Mizieb should not be restricted to the public not should future woodland areas in Malta be claimed by unauthorized entities. Furthermore, building infrastructural facilities such as public toilets, park benches, and bins has to be taken into account in direct proximity to these areas.*